

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

ANN JOHNSON, AS THE  
REPRESENTATIVE OF A CLASS OF  
SIMILARLY SITUATED PERSONS, AND  
ON BEHALF OF THE ROYAL CARIBBEAN  
CRUISES LTD. RETIREMENT SAVINGS  
PLAN,

Plaintiffs,

v.

RUSSELL INVESTMENT MANAGEMENT  
LLC,

Defendant.

Case No.: 2:21-cv-00743-RSM

**STIPULATION AND ORDER  
REGARDING AMENDED COMPLAINT  
AND DEADLINE TO ANSWER OR  
OTHERWISE RESPOND**

**Noting Date: July 27, 2021**

Pursuant to Local Rules 7(d)(1) and 10(g), Plaintiff Ann Johnson, as representative of a class of similarly situated persons, and on behalf of the Royal Caribbean Cruises Ltd. Retirement Savings Plan, and Defendant Russell Investment Management, LLC (“RIM”) (collectively, the “Parties”), by and through their undersigned counsel and subject to the approval of the Court, hereby stipulate and agree that Plaintiff Ann Johnson may file an amended complaint on or before August 30, 2021, that an answer or response to the original complaint is not required, and that the

STIPULATION AND ORDER REGARDING AMENDED COMPLAINT

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CASE NO. C21-743RSM

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deadline to answer or otherwise respond to the amended complaint shall be September 30, 2021.<sup>1</sup> Plaintiff avers that there is good cause to enter into this stipulation to ensure that the proper parties are before the Court. Further, this stipulation is not made for purposes of delay, but rather to ensure that the contemplated amendments are made before Defendants respond to the existing Complaint.

Accordingly, the Parties request that the Court approve this stipulation and enter the subjoined order to set the time for Plaintiff Ann Johnson to file an amended complaint to August 30, 2021, for Defendants to answer or otherwise respond to the amended complaint to September 30, 2021.

In light of the amendments to the Complaint described herein, the Parties also request that the Court extend the Initial Scheduling Dates set forth in the Court's order dated June 30, 2021 (Dkt. No. 25) (the "June 30th Order"), until the proper parties are before the Court and the operative complaint has been filed and served.<sup>2</sup> Subject to the approval of the Court, the Parties propose that revised proposed Initial Scheduling Dates, addressing the deadlines for the FRCP 26(f) Conference, Initial Disclosures, and Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Rule CR 16, be submitted by the parties to the amended complaint within 10 days of service of the amended complaint on all defendants.

Defendant does not waive any defenses by entering into this stipulation.

IT IS SO STIPULATED this 27 of July, 2021.

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By s/ Nicola C. Menaldo

By s/ Lindsay L. Halm

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<sup>1</sup> Plaintiff seeks to file an amended complaint to remove RIM as a defendant, add Russell Investments Trust Company ("RITC") as a defendant, and add Royal Caribbean Cruises Ltd. and the Royal Caribbean Cruises Ltd. Retirement Savings Plan Administrative Committee and Investment Committee as additional defendants.

<sup>2</sup> The June 30th Order set the deadlines for the FRCP 26(f) Conference, Initial Disclosures, and a Combined Joint Status Report and Discovery Plan for July 30, 2021, August 6, 2021, and August 13, 2021, respectively.

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*Attorneys for Plaintiff Ann Johnson*

**ORDER**

Based on the foregoing stipulation of the parties, IT IS HEREBY ORDERED that Plaintiff Ann Johnson may file an amended complaint on or before August 30, 2021.

IT IS FURTHER ORDERED that an answer or response to the original complaint is not required, and that defendants named in the amended complaint shall answer or otherwise respond to the amended complaint on or before September 30, 2021.

IT IS FURTHER ORDERED that parties named in the amended complaint shall provide the Court with revised proposed Initial Scheduling Dates, addressing the deadlines for the FRCP 26(f) Conference, Initial Disclosures, and Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Rule CR 16, within 10 days of service of the amended complaint on all defendants.

DATED this 29<sup>th</sup> day of July, 2021.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

s/ Lindsay L. Halm

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